

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

INTERFOCUS INC., a California Corporation,

Plaintiff,

v.

Hangzhou Hibaby Technology Co., Ltd., and

Hibobi Technology Limited

Defendants.

Case No.: 1:22-cv-02259

Honorable Steven C. Seeger

**THE SECOND DECLARATION OF ZHIXIONG (OWEN) LIU IN SUPPORT OF
DEFENDANTS' RESPONSE TO PLAINTIFF'S MOTION FOR PRELIMINARY
INJUNCTION, TO EXPEDITE THE PRELIMINARY INJUNCTION HEARING, AND
TO EXTEND THE OCTOBER 4, 2022 TEMPORARY RESTRAINING ORDER**

I, Zhixiong (Owen) Liu, declare and state as follows:

1. This declaration is based upon my personal knowledge of the facts stated herein or on the business records that were made at the time or in the regular course of business. If called as a witness, I could and would testify to the statements made herein.

2. I am the Vice President, Chief Marketing Officer of Hibobi.

3. Attached as Exhibit K is a true and accurate copy of the article on <https://zhuanlan.zhihu.com/p/26124141>.

4. Attached as Exhibit M is a true and accurate copy of the Judgment issued by Guangdong Province, Shenzhen City, Nanshan District Court regarding the non-compete dispute between Hibobi CEO Feilong Huang and InterFocus's Chinese entity Yingfusi Technology Co., Ltd. This case is pending before the appellate court.

5. Attached as Exhibit Q is a true and accurate copy of the email Hibobi received from Apple App Store on October 15, 2022. Apple's email is sent to Hibobi's App Store account email address: [REDACTED] Attached as Exhibit T is a true and accurate copy of the email Hibobi received from [REDACTED] on October 18, 2022. [REDACTED] email is sent to Hibobi's email address: [REDACTED] These emails lead to Hibobi's discovery of this lawsuit.

6. I checked the Hibobi Apple App store status on October 25, 2022, and it is still hidden, which means Hibobi Apple App cannot be downloaded by customers worldwide. Attached as Exhibit V is a true and accurate copy of the relevant sales of the products at issue.

7. Attached as Exhibit R is a true and accurate screenshot of Hibobi Apple App's data analysis and download metrics shown in Apple App Store.

8. Hibobi is a startup e-commerce company relying on holiday seasons to grow its business.

9. I checked the Hibobi's [REDACTED] accounts October 25, 2022, and they are still restricted.

10. Attached as Exhibit S is a true and accurate copy of the email Hibobi received from [REDACTED]

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on October 25, 2022, in Hangzhou, Zhejiang, China.

Zhixiong Liu.
Zhixiong (Owen) Liu